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September 13, 2021

**VIA ECF**

Hon. Denise L. Cote  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

*Re:* E.G. o/b/o S.G. v. Dep't of Educ. 21-cv-4964 (DLC)

Dear Judge Cote:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, Georgia M. Pestana, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.*, as well as for this action.

I write to request a 90-day stay of this case, including a stay of the deadline by which Defendant must file its answer. Plaintiff consents to these requests, and has agreed to provide billing records for this matter by today, September 13, 2021. This is the second request for an extension of the time to answer and the first request for a stay. Defendant's first request for an extension was made on June 25, 2021 and granted that same day.

The requested extension would provide Defendant with sufficient time to review the billing records (once provided) with the administrative record, and obtain settlement authority from the New York City Office of the Comptroller. We are hopeful that the parties will settle this matter without the need for further burden on the Court's time.

*Denied. Any response is due  
9/28. A conference will be  
held as scheduled on 9/30.  
Denise Cote  
9/14/21*

Accordingly, Defendant respectfully requests that the action be stayed for 90 days.

Thank you for considering these requests.

Respectfully submitted,

Simone Nicholson

/s/

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Special Assistant Corporation Counsel

cc: Irina Roller (via ECF)